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Lafayette, Louisiana January 27, 2005 CULLEN R. LISKOW AUSTIN W. LEWIS

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Hon. James H. Welsh Commissioner of Conservation Office of Conservation Post Office Box 94275 Baton Rouge, LA 70804-4275

Re:

U TUSC RA SUD 20350 TUSC RA SUD 20800 TUSC RA SUD 21100 TUSC RA SUD

Judge Digby Field, Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the above referenced units, all in Judge Digby Field, Pointe Coupee Parish, Louisiana, for which rules and regulations were established and drilling and production units were created for the exploration for and production of gas and condensate by the 1046 Office of Conservation Order, as amended by the 1046-A Series of Orders, the 1046-D and the 1046-F Series of Office of Conservation Orders, including the units designated U TUSC RA SUD, 20350 TUSC RA SUD, 20800 TUSC RA SUD and 21100 TUSC RA SUD:

- 1. To permit the applicant to recomplete, designate and utilize the BP America Production Company M. C. Delambre et al No. 1 Well as alternate unit well for the U TUSC RA SUD, 20350 TUSC RA SUD, 20800 TUSC RA SUD and the 21100 TUSC RA SUD, said well located as shown on the plats attached hereto for the respective units, in accordance with the spacing provisions of the 1046-A, 1046-F and 1046-D Series of Office of Conservation Orders and LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- 2. To permit the applicant to recomplete, designate and utilize the BP America Production Company Ivy Major No. 5 Well as substitute unit well for the 20800 TUSC RA

SUD, said well located as shown on the plat attached hereto for the respective unit, in accordance with the spacing provisions of the 1046-F Series of Office of Conservation Orders and LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).

- 3. To permit the operator to produce the unit allowable for each of the above mentioned units from the approved unit or substitute unit well and the existing and proposed alternate unit wells, in any combination, at its option.
- 4. To find that the aforementioned wells are necessary to efficiently and economically drain a portion of the reservoir covered by each of the subject units which cannot be so drained by any existing well within said units.
- 5. Except to the extent herein designated, to continue in full force and effect the provisions of Office of Conservation Order No. 1046, as amended and supplemented by the 1046-A Series of Orders, and the 1046-F and 1046-D Series of Office of Conservation Orders and the units created thereby.
 - 6. To consider such other matters as may be pertinent.

The Upper Tuscaloosa Sand, Reservoir A, in the Judge Digby Field, Pointe Coupee Parish, Louisiana, was previously defined in 1046-A Series of Office of Conservation Orders, and redefined by Office of Conservation Order No. 1046-A-14, effective January 12, 2000.

The 20,350' Tuscaloosa Sand, Reservoir A, in the Judge Digby Field, Pointe Coupee Parish, Louisiana, was previously defined in Office of Conservation Order No. 1046-A-15, effective January 12, 2000, and was redefined in Office of Conservation Order No. 1046-A-38, effective April 6, 2004.

The 20,800' Tuscaloosa Sand, Reservoir A, in the Judge Digby Field, Pointe Coupee Parish, Louisiana, was previously defined in Office of Conservation Order No. 1046-F, effective July 23, 2002.

The 21,100' Tuscaloosa Sand, Reservoir A, in the Judge Digby Field, Pointe Coupee Parish, Louisiana, was previously defined in Office of Conservation Order No. 1046-D, effective June 2, 1998.

In the opinion of the applicant, the recompletion, designation and use of the M. C. Delambre et al No. 1 Well and the Ivy Major No. 5 Well are necessary to efficiently and economically drain the subject units that they will serve and such designation and use will not cause harm or injury to others. The proposed designation and use of each well should increase efficient recovery of the contents of the subject reservoirs and promote orderly development of the field.

Attached hereto and made a part hereof are plats outlining the applicant's proposals along with a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules

of Procedure, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed herewith is our check on behalf of the applicant in the amount of \$3,020.00 **made payable to the Office of Conservation** and representing the required hearing application fee.

Very truly yours,

LISKOW & LEWIS

Richard W. Revels, Jr.

RWRjr/dbf Enclosures

cc: Lafayette District Office of Conservation

cc: Interested Owners, Represented Parties and Interested Parties

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